

# **EXHIBIT B**

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

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WEATHERFORD SWITZERLAND TRADING  
AND DEVELOPMENT GMBH, solely in its  
capacity as Administrative Agent of a certain  
indenture dated as of June 28, 2016;  
WEATHERFORD LATIN AMERICA, S.C.A.,

Plaintiffs,

v.

PETRÓLEOS DE VENEZUELA, S.A. AND  
PDVSA PETRÓLEO, S.A.,

Defendants.

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Index No.:

**NOTICE OF MOTION FOR  
SUMMARY JUDGMENT IN  
LIEU OF COMPLAINT**

**PLEASE TAKE NOTICE** that upon the summons dated November 1, 2023, and the annexed Affidavit of Max Kricorian, sworn to on October 25, 2023, the exhibits attached thereto, the memorandum of law submitted herewith, and all other papers and proceedings heretofore had herein, Plaintiffs Weatherford Latin America, S.C.A. and Weatherford Switzerland Trading and Development GmbH, by and through their undersigned counsel, will move this Court at the Courthouse located at 60 Centre Street, New York, New York 10007, Room 130, on December 15, 2023, at 9:30 AM, or as soon thereafter as counsel can be heard, for an Order pursuant to CPLR 3213, on the grounds that this is an action based upon an instrument for the payment of money only and that no triable issue of fact exists, directing the entry of judgment for the plaintiffs and against the defendants in the amount of \$90,000,006.74 plus accrued interest, and for attorneys' fees and such other and further relief as this Court may deem just and proper.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to CPLR 3213, answering papers, if any, shall be served upon the undersigned counsel at least ten (10) days prior to the time set forth for the hearing of this motion.

Dated: New York, New York  
November 1, 2023

COHEN TAUBER SPIEVACK & WAGNER P.C

By: /s/ Sari E. Kolatch  
Sari E. Kolatch  
420 Lexington Ave., Suite 2400  
New York, New York 10170  
Tel.: (212) 381-8729  
skolatch@ctswlaw.com

*Attorneys for Weatherford Latin America,  
S.C.A. and Weatherford Switzerland Trading  
and Development GmbH*

To: Petroleos de Venezuela, S.A.  
c/o Corporation Service Company  
80 State Street  
Albany, NY 12207-2543

PDVSA Petroleo, S.A.  
c/o Corporation Service Company  
80 State Street  
Albany, NY 12207-2543